FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) OFFICE OF AIR QUALITY

Galbreath, Inc.
U.S. 35 and Rosser Drive
Winamac, Indiana 46996

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F 131-14890-00004	
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: December 31, 2001 Expiration Date: December 31, 2006

TABLE OF CONTENTS

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]
C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]
C.12 Monitoring Methods [326 IAC 3] [40 CFR 60][40 CFR 63]

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]
C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]
C.14 Compliance Response Plan - Failure to Take Response Steps [326 IAC 2-8-4, 5]
C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4, 5]

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]
C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]
C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

Stratospheric Ozone Protection
C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

SECTION D.1 FACILITY OPERATION CONDITIONS: Six (6) surface coating paint booths

Emission Limitations and Standards [326 IAC 2-8-4(1)]
D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-8-4] [326 IAC 2-2] [40 CFR 52.21]
D.1.2 Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4]
D.1.3 Particulate Matter (PM_{10})[326 IAC 2-8-4]
D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]
D.1.5 Particulate Matter (PM) [326 IAC 6-3-2]
D.1.6 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

Compliance Determination Requirements
D.1.7 Volatile Organic Compounds (VOC)
D.1.8 VOC Emissions
D.1.9 Hazardous Air Pollutants (HAPs)
D.1.10 HAP Emissions
D.1.11 Particulate Matter (PM)

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]
D.1.12 Monitoring

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]
D.1.13 Record Keeping Requirements
D.1.14 Reporting Requirements

SECTION D.2 FACILITY OPERATION CONDITIONS: Insignificant Activities

Emission Limitations and Standards [326 IAC 2-8-4(1)]
D.2.1 Particulate Matter (PM) [326 IAC 6-3-2]
D.2.2 Volatile Organic Compounds [326 IAC 8-3-5] [326 IAC 8-3-2]

Certification
Emergency Occurrence Report
Quarterly Reports
Quarterly Deviation and Compliance Monitoring Report

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary metal product fabrication source producing solid waste handling equipment.

Authorized Individual:	William Haynes
Source Address:	U.S. 35 and Rosser Drive, Winamac, Indiana 46996
Mailing Address:	P.O. Box 220, Winamac, Indiana 46996
General Source Phone Number:	(361)358-7022
SIC Code:	3444
County Location:	Pulaski
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

(a) Two (2) surface coating paint booths, located in Plant 1, identified as Booth 1, constructed in 1968, utilizing the airless method of spraying and dry filters as control, exhausting to vent #1 (stacks 1 through 8), maximum capacity: 41.18 pounds of paint per hour and 4.24 pounds of solvents per hour, total.

(b) Two (2) surface coating paint booths, located in Plant 2, identified as Booth 2 (south) and Booth 3 (north), constructed in 1978 and 1989, respectively, utilizing the airless method of spraying and dry filters as control, exhausting to vents #2 (stack 2) and #3 (stack 3), respectively, maximum capacity: 18.02 pounds of paint per hour and 2.25 pounds of solvents per hour, each.

(c) Two (2) surface coating paint booths, located in Plant 2, identified as SC Primer and SC Finish, utilizing the electrostatic airless method of spraying and dry filters as control, exhausting to vents SC Primer and SC Finish, respectively, maximum capacity: 79.18 pounds of primer per hour and 71.27 pounds of finish coat per hour, total.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour. There are no boilers at this source.

(b) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage

capacity less than or equal to 10,500 gallons.

(c) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.

(d) The following VOC and HAP storage containers:

(1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.

(2) Vessels storing lubricating oil, hydraulic oils, machining oils, and machining fluids.

(e) Application of oils, greases lubricants or other nonvolatile materials applied as temporary protective coatings.

(f) Machining where an aqueous cutting coolant continuously floods the machining interface.

(g) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. Three (3) parts washers, using only non-halogenated solvents. [326 IAC 8-3-5] [326 IAC 8-3-2]

(h) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-3-2]

(i) Closed loop heating and cooling systems.

(j) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(k) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.

(l) Blowdown for any of the following: sight gas, boiler, compressors, pumps, and cooling tower.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permit Conditions

(a) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.

(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.4 Enforceability [326 IAC 2-8-6]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)] [326 IAC 2-8-5(a)(4)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM,

OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality.[326 IAC 2-8-4(5)(E)]

(c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; and

(3) Denial of a permit renewal application.

(b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.

(c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

(5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.14 Emergency Provisions [326 IAC 2-8-12]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section)
or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

Failure to notify IDEM, OAQ, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-1.1-1(1).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

(c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15]

(a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-8-11.1 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional conditions:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).

(d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.20 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management

Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-11(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

(a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action, or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

B.24 Advanced Source Modification Approval [326 IAC 2-8-4(11)] [326 IAC 2-1.1-9]

(a) The requirements to obtain a permit revision under 326 IAC 2-8-11.1 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Section A.2.

(b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction work is suspended for a continuous period of one (1) year or more.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per consecutive twelve (12) month period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable;

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per consecutive twelve (12) month period; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per consecutive twelve (12) month period.

(b) Any change or modification that increases the potential to emit PM to two hundred and fifty (250) tons per year or more may make the source subject to the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), and shall require prior IDEM, OAQ, approval.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

(e) Condition C.1 from T 131-7468-00004, issued on September 24, 1998, which states that pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21, this source is a major source, is not applicable because the potential to emit VOC is limited by this FESOP to less than 100 tons per year. Therefore, the potential VOC emissions are less than 250 tons per year, and this source is a minor source pursuant to 326 IAC 2-2.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9

or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.9 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ, not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule with full justification of the reasons for inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

(a) A compliance schedule for meeting the requirements of 40 CFR 68; or

(b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP).

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.14 Compliance Response Plan - Failure to Take Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable response steps.

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ, shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall constitute a violation of the permit.

(c) The Permittee is not required to take any further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.

(e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

(a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

(a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC2-1.1-1(1).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156

(b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

(a) Two (2) surface coating paint booths, located in Plant 1, identified as Booth 1, constructed in 1968, utilizing the airless method of spraying and dry filters as control, exhausting to vent #1 (stacks 1 through 8), maximum capacity: 41.18 pounds of paint per hour and 4.24 pounds of solvents per hour, total.

(b) Two (2) surface coating paint booths, located in Plant 2, identified as Booth 2 (south) and Booth 3 (north), constructed in 1978 and 1989, respectively, utilizing the airless method of spraying and dry filters as control, exhausting to vents #2 (stack 2) and #3 (stack 3), respectively, maximum capacity: 18.02 pounds of paint per hour and 2.25 pounds of solvents per hour, each.

(c) Two (2) surface coating paint booths, located in Plant 2, identified as SC Primer and SC Finish, utilizing the electrostatic airless method of spraying and dry filters as control, exhausting to vents SC Primer and SC Finish, respectively, maximum capacity: 79.18 pounds of primer per hour and 71.27 pounds of finish coat per hour, total.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-8-4] [326 IAC 2-2] [40 CFR 52.21]

(a) The amount of VOC delivered to the applicators, plus VOC in cleanup solvents used, at the total of six (6) surface coating paint booths in Plants 1 and 2 (Booth 1 (consisting of two (2) booths), Booth 2, Booth 3, SC Primer and SC Finish) shall be limited to less than 99.0 tons per consecutive twelve (12) month period, total. This will limit the potential to emit VOC from the entire source to less than 100 tons per year and shall make the requirements of 326 IAC 2-7, not applicable. This will also limit the potential to emit VOC to less than 250 tons per year. Therefore, the requirements of 326 IAC 2-2, PSD, are also not applicable.

(b) Condition D.1.1(a) from T 131-7468-00004, issued on September 24, 1998, which states that any change or modification which may increase the potential VOC emissions from the paint rooms #1, #2, and #3, (now identified as Booths 1, 2 and 3) must be approved by the Office of Air Management (OAM) (now Office of Air Quality (OAQ) before such change may occur, is not applicable because the Permittee must apply to IDEM, OAQ, for changes to the source as required by 326 IAC 2-8-10 (Administrative Permit Amendments) and 326 IAC 2-8-11.1 (Permit Revisions), only. Therefore, Condition D.1.1(a) from T 131-7468-00004, issued on September 24, 1998, is hereby rescinded.

D.1.2 HAPs Limitations [326 IAC 2-8-4]

(a) The worst case single HAP delivered to the coating applicators, plus the amount of that HAP in cleanup solvents used, at the six (6) surface coating paint booths in Plants 1 and 2 (Booth 1 (consisting of two (2) booths), Booth 2, Booth 3, SC Primer and SC Finish) shall be limited to less than 9.0 tons per consecutive twelve (12) month period, total. This will limit the potential to emit each individual HAP from the total of all facilities at this source to less than 10 tons per year and make the requirements of 326 IAC 2-7 not applicable.

(b) The combination of HAPs delivered to the coating applicators, plus total HAPs in cleanup solvents used, at the six (6) Surface Coating Paint Booths in Plants 1 and 2 (Booth 1

(consisting of two (2) booths), Booth 2, Booth 3, SC Primer and SC Finish) shall be limited to less than 24.0 tons per consecutive twelve (12) month period, total. This will limit the potential to emit total HAPs from the total of all facilities at this source to less than 25 tons per year, and make the requirements of 326 IAC 2-7 not applicable.

D.1.3 Particulate Matter (PM_{10}) [326 IAC 2-8-4]

The solids delivered to the applicators at the six (6) surface coating paint booths in Plants 1 and 2 (Booth 1 (consisting of two (2) booths), Booth 2, Booth 3, SC Primer and SC Finish) shall be limited to less than 38,400 tons per consecutive twelve (12) month period, total, based on a seventy-five percent (75%) transfer efficiency, which is equivalent to PM_{10} emissions of less than 96.0 tons per year from the total of the six (6) paint booths and less than 100 tons per year from the total of all facilities at this source, when operating the dry filters at all times when the six (6) paint booths are in operation. Therefore, the requirements of 326 IAC 2-7 are not applicable. As a result of this PM_{10} limit, and since PM is equal to PM_{10} at the six (6) paint booths, the PM emissions from the entire source will also be limited to less than 100 tons per year.

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

(a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), no owner or operator of the two (2) surface coating paint booths (SC Primer and SC Finish), located in Plant 2, used for coating of miscellaneous metal parts or products may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of 3.5 pounds of VOC per gallon of coating excluding water.

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), solvent sprayed from the application equipment during clean up or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

(b) The amount of VOC delivered to the applicators, plus VOC in cleanup solvents used, at the one (1) surface coating paint booth, identified as Booth 3, constructed in 1989, shall be limited to less than twenty-five (25) tons per consecutive twelve (12) month period. Therefore, the potential to emit VOC is less than 25 tons per year, and the requirements of 326 IAC 8-2-9 are not applicable to Booth 3.

(c) Condition D.1.1(b) from T 131-7468-00004, issued on September 24, 1998, which states that the total quantity of VOC delivered to the coating applicators and solvents used in the paint room #3 shall be limited to 2.07 tons per month (24.8 tons per year), is not applicable because the VOC delivered to the coating applicators at Booth 3 will be limited to less than 25 tons per consecutive twelve (12) month period, as required by Condition D.1.4(b). This does not change the annual emission limitation, but does allow for maximum flexibility. Therefore, Condition D.1.1(a) from 131-7468-00004, issued on September 24, 1998, is hereby rescinded.

D.1.5 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the six (6) surface coating paint booths in Plants 1 and 2 (Booth 1 (consisting of two (2) booths), Booth 2, Booth 3, SC Primer and SC Finish) shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.1.6 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.7 Volatile Organic Compounds (VOC)

Compliance with the VOC usage and content limitations contained in Conditions D.1.1 and D.1.4 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

D.1.8 VOC Emissions

Compliance with Conditions D.1.1 and D.1.4(b) shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the twelve (12) month period.

D.1.9 Hazardous Air Pollutants (HAPs)

Compliance with the HAPs usage limitations contained in Condition D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

D.1.10 Hazardous Air Pollutants (HAPs) Emissions

Compliance with Condition D.1.2 shall be demonstrated within 30 days of the end of each month based on the total single and combination of HAPs usage for the month.

D.1.11 Particulate Matter (PM and PM_{10})

(a) In order to comply with Conditions D.1.3 and D.1.5, the dry filters for PM and PM_{10} control shall be in operation at all times when the two (2) surface coating paint booths, located in Plant 1, identified as Booth 1, are in operation.

(b) In order to comply with Conditions D.1.3 and D.1.5, the dry filters for PM and PM_{10} control shall be in operation at all times when the two (2) surface coating paint booths, located in Plant 2, identified as Booth 2 (south) and Booth 3 (north) are in operation.

(C) In order to comply with Conditions D.1.3 and D.1.5, the dry filters for PM and PM_{10} control shall be in operation at all times when the two (2) surface coating paint booths, located in Plant 2, identified as SC Primer and SC Finish, are in operation.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.12 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (vent #1 (stacks 1 through 8 at Plant 1), vent #2 (stack 2 at Plant 2), vent #3 (stack 3 at Plant 2), vent SC Primer and vent SC Finish) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from stacks (vent #1 (stacks 1 through 8 at Plant 1), vent #2 (stack 2 at Plant 2), vent #3 (stack 3 at Plant 2), vent SC Primer and vent SC Finish) and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting

contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.13 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1, D.1.2, D.1.3 and D.1.4, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits established in Conditions D.1.1 and D.1.4, the solids usage limit and PM_{10} emission limit in Condition D.1.3, and the HAP usage limits established in Condition D.1.2.

(1) The amount and VOC, HAP and solids content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The cleanup solvent usage for each month;

(4) The total VOC, total solids, individual HAP and total HAP usage for each month; and

(5) The weight of VOCs, PM and PM_{10}, individual HAPs and total HAPs emitted for each compliance period.

(b) To document compliance with Conditions D.1.3, D.1.5 and D.1.12, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.14 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1, D.1.2, D.1.3, and D.1.4(b) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour. There are no boilers at this source.

(b) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.

(c) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.

(d) The following VOC and HAP storage containers:

(1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.

(2) Vessels storing lubricating oil, hydraulic oils, machining oils, and machining fluids.

(e) Application of oils, greases lubricants or other nonvolatile materials applied as temporary protective coatings.

(f) Machining where an aqueous cutting coolant continuously floods the machining interface.

(g) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. Three (3) parts washers, using only non-halogenated solvents. [326 IAC 8-3-5] [326 IAC 8-3-2]

(h) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-3-2]

(i) Closed loop heating and cooling systems.

(j) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(k) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.

(l) Blowdown for any of the following: sight gas, boiler, compressors, pumps, and cooling tower.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the insignificant brazing, cutting, soldering and welding shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

D.2.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5] [326 IAC 8-3-2]

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of the three (3) insignificant parts washers, constructed after July 1, 1990, shall ensure that the following requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF));

(B) The solvent is agitated; or

(C) The solvent is heated.

(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9EC) (one hundred twenty degrees Fahrenheit (120EF)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent is used is insoluble in, and heavier than, water.

(C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of the three (3) insignificant parts washers construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.

(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

(c) The requirements of this conditions satisfy the requirements of 326 IAC 8-3-2 and 326 IAC 8-3-5.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Galbreath, Inc.
Source Address: U.S. 35 and Rosser Drive, Winamac, Indiana 46996
Mailing Address: P.O. Box 220, Winamac, Indiana 46996
FESOP No.: F 131-14890-00004

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Affidavit (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

COMPLIANCE BRANCH
100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT

Source Name: Galbreath, Inc.
Source Address: U.S. 35 and Rosser Drive, Winamac, Indiana 46996
Mailing Address: P.O. Box 220, Winamac, Indiana 46996
FESOP No.: F 131-14890-00004

This form consists of 2 pages **Page 1 of 2**

9 This is an emergency as defined in 326 IAC 2-7-1(12)

- The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (**2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH

FESOP Quarterly Report

Source Name:	Galbreath, Inc.
Source Address:	U.S. 35 and Rosser Drive, Winamac, Indiana 46996
Mailing Address:	P.O. Box 220, Winamac, Indiana 46996
FESOP No.:	F 131-14890-00004
Facility:	Six (6) surface coating paint booths in Plants 1 and 2 (Booth 1 (consisting of two (2) booths), Booth 2, Booth 3, SC Primer and SC Finish)
Parameter:	VOC delivered to the applicators, plus VOC in cleanup solvents used
Limit:	Less than 99.0 tons per consecutive twelve (12) month period

YEAR: _____

Month	VOC Usage (tons)	VOC Usage (tons)	VOC Usage (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH

FESOP Quarterly Report

Source Name:	Galbreath, Inc.
Source Address:	U.S. 35 and Rosser Drive, Winamac, Indiana 46996
Mailing Address:	P.O. Box 220, Winamac, Indiana 46996
FESOP No.:	F 131-14890-00004
Facility:	Six (6) surface coating paint booths in Plants 1 and 2 (Booth 1 (consisting of two (2) booths), Booth 2, Booth 3, SC Primer and SC Finish)
Parameter:	Worst case individual HAP delivered to the applicators, plus amount of that HAP in cleanup solvents used
Limit:	Less than 9.0 tons per consecutive twelve (12) month period, total

YEAR: _____

Month	Worst Case Individual HAP Usage (tons)	Worst Case Individual HAP Usage (tons)	Worst Case Individual HAP Usage (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH

FESOP Quarterly Report

Source Name:	Galbreath, Inc.
Source Address:	U.S. 35 and Rosser Drive, Winamac, Indiana 46996
Mailing Address:	P.O. Box 220, Winamac, Indiana 46996
FESOP No.:	F 131-14890-00004
Facility:	Six (6) surface coating paint booths in Plants 1 and 2 (Booth 1 (consisting of two (2) booths), Booth 2, Booth 3, SC Primer and SC Finish)
Parameter:	Total HAPs delivered to the applicators, plus total HAPs in cleanup solvents used
Limit:	Less than 24.0 tons per consecutive twelve (12) month period, total

YEAR: _____

Month	Total HAP Usage (tons)	Total HAP Usage (tons)	Total HAP Usage (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH

FESOP Quarterly Report

Source Name:	Galbreath, Inc.
Source Address:	U.S. 35 and Rosser Drive, Winamac, Indiana 46996
Mailing Address:	P.O. Box 220, Winamac, Indiana 46996
FESOP No.:	F 131-14890-00004
Facility:	Six (6) surface coating paint booths in Plants 1 and 2 (Booth 1 (consisting of two (2) booths), Booth 2, Booth 3, SC Primer and SC Finish)
Parameter:	Solids delivered to the applicators
Limit:	Less than 38,400 tons per consecutive twelve (12) month period, total

YEAR: _____

Month	Solids Delivered to the Applicators (tons)	Solids Delivered to the Applicators (tons)	Solids Delivered to the Applicators (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH

FESOP Quarterly Report

Source Name:	Galbreath, Inc.
Source Address:	U.S. 35 and Rosser Drive, Winamac, Indiana 46996
Mailing Address:	P.O. Box 220, Winamac, Indiana 46996
FESOP No.:	F 131-14890-00004
Facility:	One (1) surface coating paint booth in Plant 2 (Booth 3)
Parameter:	VOC delivered to the applicators, plus VOC in cleanup solvent used
Limit:	Less than 25 tons per consecutive twelve (12) month period

YEAR: _____

Month	VOC Usage (tons)	VOC Usage (tons)	VOC Usage (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Galbreath, Inc.
Source Address: U.S. 35 and Rosser Drive, Winamac, Indiana 46996
Mailing Address: P.O. Box 220, Winamac, Indiana 46996
FESOP No.: F 131-14890-00004

Months: _____ **to** _____ **Year:** _____

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Page 2 of 2

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: ______________________

Form Completed By: ______________________________________

Title/Position: ______________________________________

Date: ______________________________________

Phone: ______________________________________

Attach a signed certification to complete this report.

December 31, 2001

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the
Technical Support Document for Federally Enforceable State Operating Permit (FESOP)

Source Name:	**Galbreath, Inc.**
Source Location:	**U.S. 35 and Rosser Drive, Winamac, Indiana 46996**
County:	**Pulaski**
FESOP:	**F 131-14890-00004**
SIC Code:	**3444**
Permit Reviewer:	**CarrieAnn Paukowits/ MES**

On November 4, 2001, the Office of Air Quality (OAQ) had a notice published in the Pulaski County Journal, Winamac, Indiana, stating that Galbreath, Inc. had applied for a Federally Enforceable State Operating Permit (FESOP) to operate a stationary metal product fabrication source producing solid waste handling equipment with dry filters as overspray control. The notice also stated that OAQ proposed to issue a FESOP for this operation and provided information on how the public could review the proposed FESOP and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this FESOP should be issued as proposed.

Upon further review, the OAQ has decided to make the following changes to the FESOP. The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded)**:

Change 1:

Typographical errors in Condition D.1.12 have been corrected as follows:

D.1.12 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (vent #1 (stacks 1 through 8 at Plant 1), vent #2 (stack 2 at ~~Plant 1~~ **Plant 2**), vent #3 (stack 3 at Plant 2), vent SC Primer and vent SC Finish) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from stacks (vent #1 (stacks 1 through 8 at Plant 1), vent #2 (stack 2 at ~~Plant 1~~ **Plant 2**), vent #3 (stack 3 at Plant 2), vent SC Primer and vent SC Finish) and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Change 2:

Facility specific events that do not qualify as deviations are specified in Section D of the permit. In this permit, there are no such events. Condition B.15 is revised as follows:

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. ~~Deviations that are required to be reported by an applicable requirement~~ **A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit,** shall be reported according to the schedule stated in the applicable requirement and ~~do~~ **does** not need to be included in this report.

The ~~notification by the Permittee~~ **Quarterly Deviation and Compliance Monitoring Report** does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit ~~or a rule~~. ~~It does not include:~~

~~(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or~~

~~(2) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.~~

~~A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.~~

(c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

Change 3:

Condition C.8 has been revised to clarify that the asbestos notification must be certified by the owner or operator, and not the "authorized individual," as follows:

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at

least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The

requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

Change 4:

The final paragraph in Condition C.15 has been changed to require that the documents submitted pursuant to that condition are certified by the authorized individual, as follows:

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do ~~not~~ require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Change 5:

The OAQ has restructured condition C.14 to clarify the contents and implementation of the compliance response plan. The language regarding the OAQ's discretion to excuse failure to perform monitoring under certain conditions has been deleted. The OAQ retains this discretion, and it is not necessary to state criteria regarding the exercise of that discretion in the permit. Additionally, a Compliance Monitoring Plan is not required. All references to "Compliance Monitoring Plan" in this permit have been changed to "Compliance Response Plan." Changes are as follows:

C.14 Compliance ~~Monitoring~~ **Response** Plan - Failure to Take Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) The Permittee is required to **prepare** ~~implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:~~

~~(1) This condition;~~

~~(2) The Compliance Determination Requirements in Section D of this permit;~~

~~(3) The Compliance Monitoring Requirements in Section D of this permit;~~

~~(4) The Record Keeping and Reporting Requirements in Section C (General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and~~

~~(5) A~~ **a** Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. **A** CRP~~'s~~ shall be submitted to IDEM, OAQ, upon request ~~and shall be subject to review and approval by IDEM, OAQ~~. The CRP shall be prepared within ninety (90) days after issuance of this permit by the **Permittee, supplemented from time to time by the Permittee,** ~~and~~ maintained on site, and ~~is~~ comprised of:

~~(A)~~**(1)** Reasonable response steps that may be implemented in the event that ~~compliance related information indicates that~~ a response step is needed pursuant to the requirements of Section D of this permit; and **an expected time frame for taking reasonable response steps.**

~~(B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.~~

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition **as follows:** ~~Failure to take reasonable response steps may constitute a violation of the permit.~~

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that he emissions unit or control devise be shut down, the IDEM, OAQ, shall be promptly notified of the expected dat of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall constitute a violation of the permit.

(c) ~~Upon investigation of a compliance monitoring excursion, the~~ **The** Permittee is ~~excused from taking~~ **not required to take any** further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment **and** ~~This shall be an excuse from taking further response steps providing that~~ prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B - Deviations from Permit Requirements and Conditions.

~~(d)~~**(e)** ~~Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken.~~ **The Permittee shall record all instances when response steps are taken.** In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

~~(e)~~**(f)** **Except as otherwise provided by a rule or provided specifically in Section D,** all monitoring **as** required in Section D shall be performed ~~at all times~~ **when** the ~~equipment~~ **emission unit** is operating**, except for time necessary to perform quality assurance and maintenance activities**. ~~If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.~~

~~(f) At its discretion, IDEM may excuse the Permittee's failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides adequate justification and documents that such failures do not exceed five percent (5%) of the operating time in any quarter. Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.~~

D.1.12 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (vent #1 (stacks 1 through 8 at Plant 1), vent #2 (stack 2 at Plant 2), vent #3 (stack 3 at Plant 2), vent SC Primer and

vent SC Finish) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance ~~Monitoring~~ **Response** Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from stacks (vent #1 (stacks 1 through 8 at Plant 1), vent #2 (stack 2 at Plant 2), vent #3 (stack 3 at Plant 2), vent SC Primer and vent SC Finish) and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance ~~Monitoring~~ **Response** Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Change 6:

Several conditions were modified by removing language stating that the condition was not federally enforceable. Federal law states that failure to comply with any permit condition issued under a program that has been approved into a State Implementation Plan (SIP) is to be treated as a violation of the SIP (40 CFR 52.23). This has the effect of making all FESOP conditions federally enforceable. Indiana's FESOP program was approved as a part of Indiana's SIP at 40 CFR 52.788. Neither the program nor the underlying rule, 326 IAC 2-8 contains provisions for designating certain conditions as not federally enforceable. Changes are as follows:

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. ~~326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.~~

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2. ~~326 IAC 9-1-2 is not federally enforceable.~~

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). ~~326 IAC 6-4-2(4) is not federally enforceable.~~

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. ~~The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.~~

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD)
for a Federally Enforceable State Operating Permit (FESOP)

Source Background and Description

Source Name:	**Galbreath, Inc.**
Source Location:	**U.S. 35 and Rosser Drive, Winamac, Indiana 46996**
County:	**Pulaski**
SIC Code:	**3444**
Operation Permit No.:	**F 131-14890-00004**
Permit Reviewer:	**CarrieAnn Paukowits**

The Office of Air Quality (OAQ) has reviewed a FESOP application from Galbreath, Inc. relating to the operation of a metal product fabrication source producing solid waste handling equipment. This source was issued a Title V Operating Permit (T 131-7468-00004) on September 24, 1998. This source is proposing the construction of a new facility, and has requested a transition from Title V to FESOP. The source has changed coatings to comply with FESOP limits.

Source Definition

This metal product fabrication process producing solid waste handling equipment company consists of two (2) plants. Plants 1 and 2 are located on contiguous properties, have the same SIC codes and are owned by one (1) company. Therefore, they are considered one (1) source.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(a) Two (2) surface coating paint booths, located in Plant 1, identified as Booth 1, constructed in 1968, utilizing the airless method of spraying and dry filters as control, exhausting to vent #1 (stacks 1 through 8), maximum capacity: 41.18 pounds of paint per hour and 4.24 pounds of solvents per hour, total.

(b) Two (2) surface coating paint booths, located in Plant 2, identified as Booth 2 (south) and Booth 3 (north), constructed in 1978 and 1989, respectively, utilizing the airless method of spraying and dry filters as control, exhausting to vents #2 (stack 2) and #3 (stack 3), respectively, maximum capacity: 18.02 pounds of paint per hour and 2.25 pounds of solvents per hour, each.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

New Emission Units and Pollution Control Equipment Receiving Prior Approval

The application includes information relating to the prior approval for the construction and operation of the following equipment pursuant to 326 IAC 2-8-4(11):

(c) Two (2) surface coating paint booths, located in Plant 2, identified as SC Primer and SC Finish, utilizing the electrostatic airless method of spraying and dry filters as control, exhausting to vents SC Primer and SC Finish, respectively, maximum capacity: 79.18 pounds of primer per hour and 71.27 pounds of finish coat per hour, total.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour. There are no boilers at this source.

(b) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.

(c) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.

(d) The following VOC and HAP storage containers:

(1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.

(2) Vessels storing lubricating oil, hydraulic oils, machining oils, and machining fluids.

(e) Application of oils, greases lubricants or other nonvolatile materials applied as temporary protective coatings.

(f) Machining where an aqueous cutting coolant continuously floods the machining interface.

(g) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. Three (3) parts washers, using only non-halogenated solvents. [326 IAC 8-3-5] [326 IAC 8-3-2]

(h) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-3-2]

(i) Closed loop heating and cooling systems.

(j) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(k) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.

(l) Blowdown for any of the following: sight gas, boiler, compressors, pumps, and cooling tower.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

(a) T 131-7468-00004, issued on September 24, 1998; and

(b) AAT 131-12735-00004, issued on November 6, 2000.

All conditions from previous approvals were incorporated into this FESOP except the following:

(a) T 131-7468-00004, issued on September 24, 1998

Condition C.1: Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21, this source is a major source.

Reason not incorporated: The potential to emit VOC is limited by this FESOP to less than 100 tons per year. Therefore, the potential VOC emissions are less than 250 tons per year, and this source is a minor source pursuant to 326 IAC 2-2.

(b) T 131-7468-00004, issued on September 24, 1998

Condition D.1.1(a): Any change or modification which may increase the potential VOC emissions from the paint rooms #1, #2, and #3, (now identified as Booths 1, 2 and 3) must be approved by the Office of Air Management (OAM) (now Office of Air Quality (OAQ) before such change may occur.

Reason not incorporated: The Permittee must apply to IDEM, OAQ, for changes to the source as required by 326 IAC 2-8-10 (Administrative Permit Amendments) and 326 IAC 2-8-11.1 (Permit Revisions), only.

(c) T 131-7468-00004, issued on September 24, 1998

Condition D.1.1(b): Pursuant to CP 131-2988 issued on September 27, 1993, the total quantity of VOC delivered to the coating applicators and solvents used in the paint room #3 shall be limited to 2.07 tons per month (24.8 tons per year). Therefore, 326 IAC 8-2-9 does not apply.

Reason not incorporated: The potential to emit VOC at Booth 3 will be limited to less than 25 tons per consecutive twelve (12) month period in this proposed FESOP. This does not change the annual emission limitation, but does allow for maximum flexibility.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the FESOP be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP application for the purposes of this review was received on October 3, 2001. Additional information was received on October 22, 2001.

There was no notice of completeness letter mailed to the source.

Emission Calculations

See pages 1 through 4 of 4 of Appendix A of this document for detailed emissions calculations.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	**Potential To Emit** (tons/year)
PM	greater than 100, less than 250
PM_{10}	greater than 100, less than 250
SO_2	less than 25
VOC	greater than 250
CO	less than 100
NO_X	less than 25

Note: For the purpose of determining Title V applicability for particulates, PM_{10}, not PM, is the regulated pollutant in consideration.

HAPs	**Potential To Emit** (tons/year)
Xylenes	greater than 10
Toluene	greater than 10
MEK	greater than 10
MIBK	less than 10
Ethyl benzene	less than 10
Methanol	less than 10
Benzene	less than 10

HAPs	Potential To Emit (tons/year)
Dichlorobenzene	less than 10
Formaldehyde	less than 10
Hexane	less than 10
Toluene	less than 10
Lead	less than 10
Cadmium	less than 10
Chromium	less than 10
Manganese	less than 10
Nickel	less than 10
TOTAL	greater than 25

(a) The potentials to emit (as defined in 326 IAC 2-1.1-1(16)) of PM_{10} and VOC are equal to or greater than one hundred (100) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(c) Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

(d) This source, otherwise required to obtain a Title V permit, has agreed to accept a permit with federally enforceable limits that restrict its PTE to below the Title V emission levels. Therefore, this source will be issued a Federally Enforceable State Operating Permit (FESOP), pursuant to 326 IAC 2-8.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1999 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	0.152
PM_{10}	0.152
SO_2	0.00

Pollutant	Actual Emissions (tons/year)
VOC	89.1
CO	0.00
NO_X	0.00
HAP (MIBK)	0.09
HAP (Toluene)	8.92
HAP (Xylenes)	28.3
HAP (MEK)	0.87
HAP (Lead Compounds)	0.02

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Federally Enforceable State Operating Permit.

	Limited Potential to Emit (tons/year)						
Process/facility	**PM**	**PM_{10}**	**SO_2**	**VOC**	**CO**	**NO_X**	**HAPs**
Six (6) Surface Coating Paint Booths in Plants 1 and 2 (Booth 1 (consisting of two (2) booths), Booth 2, Booth 3, SC Primer and SC Finish)	less than 96.0	less than 96.0	0.00	less than 99.0	0.00	0.00	less than 9.0 individual less than 24.0 total
Insignificant Activities	4.00	4.00	1.00	1.00	4.00	5.00	1.00
Total Emissions	less than 100	less than 100	1.00	less than 100	4.00	5.00	Single less than 10 Total less than 25

(a) The potential to emit VOC at this source will be less than 250 tons per year. Therefore, this source will be a minor source pursuant to 326 IAC 2-2, Prevention of Significant Deterioration.

(b) The potential to emit VOC and PM_{10} are limited to comply with 326 IAC 2-8-4, FESOP. The limit on PM_{10} emissions will also result in PM emissions less than 100 tons per year.

(c) Emissions from insignificant activities are rounded to the next highest whole number to

allow for small changes in insignificant processes under the current FESOP limits.

Potential to Emit of Revision After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the proposed significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this FESOP.

	Potential to Emit (tons/year)						
Process/facility	**PM**	**PM_{10}**	**SO_2**	**VOC**	**CO**	**NO_X**	**HAPs**
Proposed Revision (Two (2) surface coating paint booths, identified as SC Primer and SC Finish)	less than 96.0	less than 96.0	0.00	less than 99.0	0.00	0.00	less than 9.0 individual less than 24.0 total
PSD Threshold Level	250	250	250	250	250	250	-

(a) This revision to an existing minor stationary source is not major because the emission increase is less than the PSD threshold levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

(b) Since the potential to emit VOC, PM and PM_{10} are greater than 25 tons per year, before and after limitations, this new facility would require a Significant Permit Revision to the FESOP, pursuant to 326 IAC 2-8-11.1, Permit Revisions. This FESOP will include operating conditions for the proposed facility, and will satisfy the requirements of 326 IAC 2-8-11.1.

County Attainment Status

The source is located in Pulaski County.

Pollutant	**Status**
PM_{10}	Attainment
SO_2	Attainment
NO_2	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_X) are precursors for the formation of ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. Pulaski County has been designated as attainment or unclassifiable for ozone.

(b) Pulaski County has been classified as attainment or unclassifiable for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Federal Rule Applicability

(a) There are still no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.

(b) There are still no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20, 40 CFR 61 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

The potential to emit VOC is limited by this proposed FESOP to less than 100 tons per year. Therefore, the potential to emit VOC at this source will be less than 250 tons per year, and this source will be a minor source pursuant to 326 IAC 2-2, Prevention of Significant Deterioration.

326 IAC 2-4.1-1 (New Source Toxics Control)

The potential to emit of each individual HAP is limited to less than 10 tons per year and the potential to emit any combination of HAPs is limited to less than 25 tons per year from the total of all facilities at this source. Therefore, the requirements of 326 IAC 2-4.1-1 do not apply to any of the facilities at this source.

326 IAC 2-6 (Emission Reporting)

This source is located in Pulaski County and the potential to emit VOC and PM_{10} is less than one hundred (100) tons per year, each, after the limitations of this FESOP. Therefore, 326 IAC 2-6 does not apply.

326 IAC 2-8-4 (FESOP)

Pursuant to this rule, the amount of $PM_{10,}$ SO_2, VOC, CO and NO_X shall be limited to less than one hundred (100) tons per year. In addition, the amount of a single HAP shall be limited to less than ten (10) tons per year and the combination of all HAPs shall be limited to less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 2-7, do not apply. Specific limitations are as follows:

(a) The amount of VOC delivered to the applicators, plus VOC in cleanup solvents used, at the total of six (6) surface coating paint booths in Plants 1 and 2 (Booth 1 (consisting of two (2) booths), Booth 2, Booth 3, SC Primer and SC Finish) shall be limited to less than 99.0 tons per consecutive twelve (12) month period, total. This will limit the potential to emit VOC from the entire source to less than 100 tons per year and shall make the requirements of 326 IAC 2-7, not applicable. This will also limit the potential to emit VOC to less than 250 tons per year. Therefore, the requirements of 326 IAC 2-2, PSD, are also not applicable.

(b) HAP emissions will be limited as follows:

(1) The worst case single HAP delivered to the coating applicators, plus the amount of that HAP in cleanup solvents used, at the six (6) surface coating paint booths in

Plants 1 and 2 (Booth 1 (consisting of two (2) booths), Booth 2, Booth 3, SC Primer and SC Finish) shall be limited to less than 9.0 tons per consecutive twelve (12) month period, total. This will limit the potential to emit each individual HAP from the total of all facilities at this source to less than 10 tons per year. Therefore, the requirements of 326 IAC 2-7 are not applicable.

(2) The combination of HAPs delivered to the coating applicators, plus total HAPs in cleanup solvents used, at the six (6) surface coating paint booths in Plants 1 and 2 (Booth 1 (consisting of two (2) booths), Booth 2, Booth 3, SC Primer and SC Finish) shall be limited to less than 24.0 tons per consecutive twelve (12) month period, total. This will limit the potential to emit total HAPs from the total of all facilities at this source to less than 25 tons per year. Therefore, the requirements of 326 IAC 2-7 are not applicable.

(c) The solids delivered to the applicators at the six (6) surface coating paint booths in Plants 1 and 2 (Booth 1 (consisting of two (2) booths), Booth 2, Booth 3, SC Primer and SC Finish) shall be limited to less than 38,400 tons per consecutive twelve (12) month period, total, based on a seventy-five percent (75%) transfer efficiency, which is equivalent to PM_{10} emissions of less than 96.0 tons per year from the total of the six (6) paint booths and less than 100 tons per year from the total of all facilities at this source, when operating the dry filters at all times when the six (6) paint booths are in operation. Therefore, the requirements of 326 IAC 2-7 are not applicable.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity limitations), except as provided in 326 IAC 5-1-3 (Temporary alternative opacity limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR Part 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 6-3-2 (Process Operations)

(a) Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the six (6) surface coating paint booths in Plants 1 and 2 (Booth 1 (consisting of two (2) booths), Booth 2, Booth 3, SC Primer and SC Finish) shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

The dry filters shall be in operation at all times the six (6) surface coating paint booths in Plants 1 and 2 are in operation, in order to comply with this limit.

(b) Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the insignificant brazing, cutting, soldering and welding shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

326 IAC 8-2-9 (Miscellaneous Metal Coating)

(a) Three (3) of the surface coating paint booths, Booth 1 (consisting of two (2) booths) and Booth 2, were constructed in 1968 and 1978, respectively, in Pulaski County. Since these facilities were constructed prior to January 1, 1980, and are not located in any of the specific counties mentioned under 326 IAC 8-2-1(a)(1), the requirements of 326 IAC 8-2-9 are not applicable.

(b) Pursuant to T 131-7468-00004, issued on September 24, 1998, the amount of VOC delivered to the applicators, plus VOC in cleanup solvents used, at the one (1) surface coating paint booth, Booth 3, constructed in 1989, is limited to less than twenty-five (25) tons per consecutive twelve (12) month period. Therefore, the potential to emit VOC is less than 25 tons per year, and the requirements of 326 IAC 8-2-9 are not applicable.

(c) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicators at the two (2) surface coating paint booths, identified as SC Primer and SC Finish, shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for air dried coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS submitted by the source, the spray booths are in compliance with this requirement.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

(a) Three of the surface coating paint booths, Booth 1 (consisting of two (2) booths) and Booth 2, were constructed prior to January 1, 1980. Therefore, the requirements of 326 IAC 8-1-6 are not applicable.

(b) The potential to emit VOC from one (1) surface coating paint booth, Booth 3, constructed in 1989, is limited to less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 are not applicable

(c) The two (2) surface coating paint booths, identified as SC Primer and SC Finish, are required to comply with 326 IAC 8-2-9. Therefore, the requirements of 326 IAC 8-1-6 are not applicable.

326 IAC 8-3-2 (Cold Cleaner Operation)

The three (3) insignificant parts washers were constructed after January 1, 1980. Therefore, they are subject to the requirements of 326 IAC 8-3-2. The requirements of 326 IAC 8-3-5 will also satisfy the requirements of this rule. The owner or operator of a cold cleaning facility shall:

(a) Equip the cleaner with a cover;

(b) Equip the cleaner with a facility for draining cleaned parts;

(c) Close the degreaser cover whenever parts are not being handled in the cleaner;

(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) Provide a permanent, conspicuous label summarizing the operating requirements; and

(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)

The three (3) insignificant parts washers were constructed after July 1, 1990, and do not have remote solvent reservoirs. Therefore, they are subject to the requirements of 326 IAC 8-3-5.

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF));

(B) The solvent is agitated; or

(C) The solvent is heated.

(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9EC) (one hundred twenty degrees Fahrenheit (120EF)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent is used is insoluble in, and heavier than, water.

(C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.

(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

326 IAC 8-6 (Organic Solvent Emission Limitations)

The source commenced operations prior to 1974. In addition, the potential to emit VOC from the total of all facilities at this source will be limited to less than 100 tons per year. Therefore, the requirements of 326 IAC 8-6 are not applicable.

Testing Requirements

There are still no testing requirements for this source.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as

grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

The six (6) surface coating paint booths in Plants 1 and 2 (Booth 1 (consisting of two (2) booths), Booth 2, Booth 3, SC Primer and SC Finish) have applicable compliance monitoring conditions as specified below:

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (vent #1 (stacks 1 through 8 at Plant 1), vent #2 (stack 2 at Plant 1), vent #3 (stack 3 at Plant 2), vent SC Primer and vent SC Finish) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from stacks (vent #1 (stacks 1 through 8 at Plant 1), vent #2 (stack 2 at Plant 1), vent #3 (stack 3 at Plant 2), vent SC Primer and vent SC Finish) and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the dry filters for overspray control must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-8 (FESOP).

Conclusion

The operation of this metal product fabrication source shall be subject to the conditions of the attached proposed FESOP No.: F 131-14890-00004.

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: Galbreath, Inc.
Address City IN Zip: U.S. 35 and Rosser Drive, Winamac, Indiana 46996
FESOP: 131-14890
Plt ID: 131-00004
Reviewer: CarrieAnn Paukowits
Date: October 3, 2001

Existing Operations

Material	Density (lbs/gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Material Usage (lbs/hr)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (pounds per hour)	Potential VOC (pounds per day)	Potential VOC (tons per year)	Particulate Potential (tons/yr)	lbs VOC/gal solids	Transfer Efficiency
Booth 1															
Red Oxide Primer	10.92	32.05%	0.0%	32.1%	0.0%	47.00%	41.18	3.50	3.50	13.20	7602.46	57.81	30.64	7.45	75%
Brown H/S Hap Free Enamel	8.34	41.97%	0.0%	42.0%	0.0%	55.30%	41.18	3.50	3.50	17.28	9954.30	75.69	26.17	6.33	75%
Red H/S HAP-Free Acrylic Enamel	8.08	43.32%	0.0%	43.3%	0.0%	61.50%	41.18	3.50	3.50	17.84	10274.61	78.13	25.56	5.69	75%
Beige H/S HAP-Free Enamel	8.68	40.32%	0.0%	40.3%	0.0%	49.90%	41.18	3.50	3.50	16.60	9564.39	72.73	26.91	7.01	75%
Worst Case Solvent (Aromatic 100)	7.34	100.00%	0.0%	100.0%	0.0%	0.00%	4.24	7.34	7.34	4.24	2442.24	18.57	0.00	n/a	75%
Booth 2															
Red Oxide Primer	10.92	32.05%	0.0%	32.1%	0.0%	47.00%	18.02	3.50	3.50	5.78	3326.77	25.30	13.41	7.45	75%
Brown H/S Hap Free Enamel	8.34	41.97%	0.0%	42.0%	0.0%	55.30%	18.02	3.50	3.50	7.56	4355.91	33.12	11.45	6.33	75%
Red H/S HAP-Free Acrylic Enamel	8.08	43.32%	0.0%	43.3%	0.0%	61.50%	18.02	3.50	3.50	7.81	4496.08	34.19	11.18	5.69	75%
Beige H/S HAP-Free Enamel	8.68	40.32%	0.0%	40.3%	0.0%	49.90%	18.02	3.50	3.50	7.27	4185.29	31.83	11.78	7.01	75%
Worst Case Solvent (Aromatic 100)	7.34	100.00%	0.0%	100.0%	0.0%	0.00%	2.25	7.34	7.34	2.25	1296.00	9.86	0.00	n/a	75%
Booth 3															
Red Oxide Primer	10.92	32.05%	0.0%	32.1%	0.0%	47.00%	18.02	3.50	3.50	5.78	3326.77	25.30	13.41	7.45	75%
Brown H/S Hap Free Enamel	8.34	41.97%	0.0%	42.0%	0.0%	55.30%	18.02	3.50	3.50	7.56	4355.91	33.12	11.45	6.33	75%
Red H/S HAP-Free Acrylic Enamel	8.08	43.32%	0.0%	43.3%	0.0%	61.50%	18.02	3.50	3.50	7.81	4496.08	34.19	11.18	5.69	75%
Beige H/S HAP-Free Enamel	8.68	40.32%	0.0%	40.3%	0.0%	49.90%	18.02	3.50	3.50	7.27	4185.29	31.83	11.78	7.01	75%
Worst Case Solvent (Aromatic 100)	7.34	100.00%	0.0%	100.0%	0.0%	0.00%	2.25	7.34	7.34	2.25	1296.00	9.86	0.00	n/a	75%
							PM	Control Efficiency	99.00%						
State Potential Emissions			**Add worst case coating to all solvents**					**Uncontrolled**		**42.2**	**24301**	**185**	**57.5**		
								Controlled		**42.2**	**24301**	**185**	**0.575**		

METHODOLOGY

Pounds of VOC per Gallon Coating less Water provided by the coating supplier.
Potential VOC Pounds per Hour = Material Usage (lbs/hr) x Weight % Organics
Potential VOC Pounds per Day = Material Usage (lbs/hr) x Weight % Organics x 24 hrs/day
Potential VOC Tons per Year = Material Usage (lbs/hr) x Weight % Organics x 8,760 hrs/yr x 1 ton/2,000 lbs
Particulate Potential Tons per Year = Material Usage (lbs/hr) x (1 - Weight % Organics) x 8,760 hrs/yr x 1 ton/2,000 lbs
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Worst Case Solvent

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: Galbreath, Inc.
Address City IN Zip: U.S. 35 and Rosser Drive, Winamac, Indiana 46996
FESOP: 131-14890
Plt ID: 131-00004
Reviewer: CarrieAnn Paukowits
Date: October 3, 2001

Proposed Facility

Material	Density (lbs/gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Material Usage (lbs/hr)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (pounds per hour)	Potential VOC (pounds per day)	Potential VOC (tons per year)	Particulate Potential (tons/yr)	lbs VOC/gal solids	Transfer Efficiency
SC Primer															
Red Oxide Primer	10.92	32.05%	0.0%	32.1%	0.0%	47.00%	79.18	3.50	3.50	25.38	609.08	111.16	47.13	7.45	80%
SC Finish															
Brown H/S Hap Free Enamel	8.34	41.85%	0.0%	41.8%	0.0%	55.30%	71.27	3.49	3.49	29.82	715.78	130.63	36.31	6.31	80%
Red H/S HAP-Free Acrylic Enamel	8.08	43.19%	0.0%	43.2%	0.0%	61.50%	71.27	3.49	3.49	30.78	738.81	134.83	35.47	5.67	80%
Beige H/S HAP-Free Enamel	8.68	40.21%	0.0%	40.2%	0.0%	49.90%	71.27	3.49	3.49	28.66	687.74	125.51	37.33	6.99	80%
Cleanup															
Acetone	6.59	0.00%	0.0%	0.0%	0.0%	0.00%	n/a	0.00	0.00	0.00	0.00	0.00	0.00	n/a	80%
							PM	Control Efficiency	99.00%						
State Potential Emissions			**Add worst case coating to all solvents**					**Uncontrolled**		**56.2**	**1348**	**246**	**84.5**		
								Controlled		**56.2**	**1348**	**246**	**0.845**		

METHODOLOGY

Pounds of VOC per Gallon Coating less Water provided by the coating supplier.
Potential VOC Pounds per Hour = Material Usage (lbs/hr) x Weight % Organics
Potential VOC Pounds per Day = Material Usage (lbs/hr) x Weight % Organics x 24 hrs/day
Potential VOC Tons per Year = Material Usage (lbs/hr) x Weight % Organics x 8,760 hrs/yr x 1 ton/2,000 lbs
Particulate Potential Tons per Year = Material Usage (lbs/hr) x (1 - Weight % Organics) x 8,760 hrs/yr x 1 ton/2,000 lbs
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Worst Case Solvent

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: Galbreath, Inc.
Address City IN Zip: U.S. 35 and Rosser Drive, Winamac, Indiana 46996
FESOP: 131-14890
Plt ID: 131-00004
Reviewer: CarrieAnn Paukowits
Date: October 3, 2001

Material	Density (lbs/gal)	Maximum Material Usage (lbs/hr)	Weight % Xylene	Weight % Toluene	Weight % MEK	Weight % MIBK	Weight % Ethyl Benzene	Weight % Methanol	Xylene Emissions (tons/yr)	Toluene Emissions (tons/yr)	MEK Emissions (tons/yr)	MIBK Emissions (tons/yr)	Ethyl benzene Emissions (tons/yr)	Methanol Emissions (tons/yr)	Total HAP Emissions (tons/yr)
Solvents															
VM&P Naphtha (67-55)	6.17	8.75	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Acetone	6.59	8.75	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Xylene (94)	7.25	8.75	85.00%	0.00%	0.00%	0.00%	15.00%	0.00%	32.58	0.00	0.00	0.00	5.75	0.00	38.33
Lacquer Thinner	7.07	8.75	70.00%	11.00%	0.00%	0.00%	0.00%	0.00%	26.83	4.22	0.00	0.00	0.00	0.00	31.04
Aromatic 100	7.34	8.75	1.00%	0.00%	90.00%	0.00%	1.00%	0.00%	0.38	0.00	34.49	0.00	0.38	0.00	35.26
Laq Th 11-155-1	7.00	8.75	0.00%	60.00%	10.00%	0.00%	0.00%	20.00%	0.00	23.00	3.83	0.00	0.00	7.67	34.49
Solvent 100	7.26	8.75	4.00%	0.00%	0.00%	0.00%	0.00%	0.00%	1.53	0.00	0.00	0.00	0.00	0.00	1.53
VM&P Naptha (66733)	6.26	8.75	7.00%	0.00%	0.00%	10.00%	1.00%	0.00%	2.68	0.00	0.00	3.83	0.38	0.00	6.90
Xylene (66800)	7.18	8.75	80.00%	0.00%	0.00%	0.00%	20.00%	0.00%	30.66	0.00	0.00	0.00	7.67	0.00	38.33
							Individual Total		**32.6**	**23.0**	**34.5**	**3.83**	**7.67**	**7.67**	**38.3**

METHODOLOGY

Coatings used in calculating emissions contain no HAPs

HAPS emission rate (tons/yr) = Maximum Material Usage (lbs/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emissions Calculations
Insignificant Activities with Quantifiable Emissions

Company Name: Galbreath, Inc.
Address City IN Zip: U.S. 35 and Rosser Drive, Winamac, Indiana 46996
FESOP: 131-14890
Plt ID: 131-00004
Reviewer: CarrieAnn Paukowits
Date: October 3, 2001

Natural Gas Combustion

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
10.6400	93.21

Pollutant

	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.089	0.354	0.028	4.66	0.256	3.91

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	9.79E-05	5.59E-05	3.50E-03	8.39E-02	1.58E-04

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel	Total
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	HAPs
Potential Emission in tons/yr	2.33E-05	5.13E-05	6.52E-05	1.77E-05	9.79E-05	0.088

Methodology
All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Three Parts Washers

Capacity (gallons)	Turnovers per year	Density (lbs/gal)	Weight % VOC	VOC emissions (tons/yr)
17	4	6.8	100%	0.231
17	4	6.8	100%	0.231
9	4	6.8	100%	0.122
			Total:	**0.585**

Methodology
VOC emissions (tons/yr) = Capacity (gallons) x Turnovers/year x Density (lbs/gal) x Weight % VOC x 1 ton/ 2,000 lbs

Metal Inert Gas (MIG) Welding

Maximum Weld Wire and Rod Consumption (lbs/yr)	Emission Factor (lbs PM/lb wire)	PM/PM10 Emissions (tons/yr)
265274	0.024	3.20

Methodology
PM/PM10 emissions (tons/yr) = Maximum Weld Wire and Rod Consumption (lbs/yr) x Emission Factor (lbs PM/lb wire) x 1 ton/ 2,000 lbs
The applicant has indicated that there are no HAP emissions from the welding processes at this source.